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November 6, 2002

BY CERTIFIED MAIL (RETURN RECEIPT)

William E. Muno, Director Superfund Division United States Environmental Protection Agency, Region 5 77 West Jackson Boulevard Chicago, IL 60604

> Sauget Area 2 Site - Groundwater Operable Unit Re:

> > Sauget, Illinois

Notice under Section 122(a) of CERCLA and

Unilateral Administrative Order

Dear Mr. Muno:

On October 16, 2002, I received the above-referenced Unilateral Administrative Order along with an EPA cover letter dated October 3, 2002 and signed by you as well as a cover letter from Solutia Inc. dated October 10, 2002.

It appears that the letter was sent to me under the mistaken belief that our firm represents Hueffmeier Brothers and/or Service America Corporation, as I responded in the past, on behalf of Service America, to allegations from private parties that Service America Corporation is the alleged successor to Hueffmeier Brothers. As Solutia is aware, however, I do not represent either entity with regard to this matter due to Pharmacia's refusal to consent to my representation of Service America Corporation and to waive any conflict of interest that might exist due to my firm's representation of Pharmacia and/or Solutia in unrelated matters.

As such, I am not authorized to accept service of the Unilateral Administrative Order on behalf of either Hueffmeier Brothers or Service America Corporation and delivery to me should not be construed as service upon Service America Corporation or Hueffmeier Brothers.

Very truly yours,

E. Donald Elliott

of PAUL, HASTINGS, JANOFSKY & WALKER LLP